

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

JANE DOE,

Plaintiff,

v.

LIMESTONE UNIVERSITY F/K/A
LIMESTONE COLLEGE, COLLINS
MURPHY, MG FREESITES, LTD. d/b/a
PORNHUB.COM and HAMMY MEDIA,
LTD. d/b/a XHAMSTER.COM

Defendants.

Civil Action No.: 7:21-cv-03193-JD

**DEFENDANT MG FREESITES, LTD.’S CONSENT MOTION
FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b), Defendant MG Freesites, LTD., d/b/a Pornhub.com (“MG Freesites”) files this Consent Motion for Extension of Time to Respond to Plaintiff Jane Doe’s Amended Complaint (Dkt. No. 11), and in support thereof states as follows:

1. On September 30, 2021, Plaintiff filed her Complaint in this action (Dkt. 1).
2. On November 18, 2021, Plaintiff filed her Amended Complaint.
3. On January 24, 2022, Defendant MG Freesites executed a Waiver of Service (Dkt. 14) requiring it to respond to Plaintiff’s Amended Complaint on or before April 25, 2022.¹
4. Defendant MG Freesites anticipates filing a Motion to Dismiss the Complaint in the instant action under Rule 12(b)(6) of the Federal Rules Civil Procedure. However, counsel for the Plaintiff has indicated to counsel Defendant they anticipate amending their Complaint in the next thirty (30) days. Accordingly, Plaintiff and counsel for MG Freesites have agreed that it is in

¹ The Waiver of Service was filed with the Court on or about February 3, 2022.

the interests of judicial economy and efficiency to briefly defer MG Freesites' response to the Amended Complaint.

5. Federal Rule of Civil Procedure 6(b) allows this Court discretion to enlarge periods of time for good cause where, as here, the requested extension is made before the deadline. The parties agree that the interests of judicial economy and efficiency justify the requested extension.

6. The requested extension is not sought for dilatory reasons or for any other improper purpose, will not affect any other deadlines, will not prejudice any party or the Court, and no prior extension has been requested from the Court by Defendant MG Freesites. The parties agree that neither will be prejudiced by the requested extension of time.

7. Plaintiff consents to Defendant MG Freesites's request.

WHEREFORE, Defendant MG Freesites respectfully requests this Court enter an order enlarging the time within which to respond to the Complaint by thirty (30) days, or until and including May 25, 2022.

WE SO MOVE:

DATED: April 20, 2022

Columbia, South Carolina

TURNER, PADGET, GRAHAM AND LANEY,
P.A.

By: /s/ Mark B. Goddard
Mark B. Goddard | Attorney ID: 9361
1901 Main Street, 17th Floor
Columbia, SC 29201
email | mgoddard@turnerpadget.com
direct | 803-227-4334

J. Kenneth Carter | Attorney ID: 05108
email | kcarter@turnerpadget.com
direct | 864-552-4611
Post Office Box 1509
Greenville, South Carolina 29602
facsimile | 864-282-5993
Attorneys for Defendant MG Freesites, Ltd.

WE CONSENT:

BELL LEGAL GROUP, LLC

/s/ J. Edward Bell, III

J. Edward Bell, III (#1280)

Joshua M. W. Salley (#13214)

BELL LEGAL GROUP, LLC

219 North Ridge Street

Georgetown, SC 29440

Telephone: (843) 546-2408

jeb@edbelllaw.com

jsalley@edbelllaw.com

Counsel for Plaintiffs

DOLT, THOMPSON, SHEPHERD & CONWAY, PSC

Tyler S. Thompson (admitted Pro Hac Vice)

Liz J. Shepherd (admitted Pro Hac Vice)

Jordan A. Stanton (admitted Pro Hac Vice)

DOLT, THOMPSON, SHEPHERD & CONWAY, PSC

13800 Lake Point Circle

Louisville, KY 40223

Telephone: (502) 244-7772

tthompson@kytrial.com

lshepherd@kytrial.com

jstanton@kytrial.com

Counsel for Plaintiffs